## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

In re:	)	
EAGLE PROPERTIES AND INVESTMENTS, LLC Debtor.	)	CASE NO. 23-10566-KHK
	)	CHAPTER 7

## **DECLARATION OF REAL ESTATE AGENT and ASSET MANAGER**

- I, Stephen Karbelk, declare as follows:
- 1. I am a real estate agent duly licensed by the Commonwealth of Virginia and the State of Maryland and affiliated with CENTURY 21 New Millennium. CENTURY 21 New Millennium is licensed as a real estate broker in Virginia, Maryland, District of Columbia, West Virginia, and Pennsylvania. I am the Team Leader of Auction Markets, LLC DBA RealMarkets, a CENTURY 21 New Millennium Team. Stephanie Young and Robert Walters are licensed real estate agents on my team that will be supporting me with these listings. I anticipate that I will need to have additional agents within CENTURY 21 New Millennium support me. I will file an updated Declaration for each new agent that will be supporting me.
- I am a partner in CENTURY 21 Commercial New Millennium, a commercial real estate brokerage licensed in Virginia, Maryland, and the District of Columbia. I intend on marketing the office condominium commercial properties located at 2565
   2567 Chain Bridge Road, Vienna, VA 22181 under the CENTURY 21 Commercial New Millennium brand.

- 3. I am familiar with the Trustee's Application to Employ Real Estate Agent and Broker for the sale of the properties identified on the Debtor's Schedules ("Properties") described therein, and believe that CENTURY 21 New Millennium, CENTURY 21 Commercial New Millennium, my team and I are qualified to represent the Trustee and the estate in connection with the marketing of the Properties. I have read the Trustee's Application and I have agreed to accept employment on the terms and conditions set forth in the Trustee's Application.
- 4. I am a disinterested person within the meaning of 11 U.S.C. § 101(14). I have also confirmed with Stephanie Young and Robert Walters that they are disinterested persons within the meaning of 11 U.S.C. § 101(14).
- 5. That to the best of my knowledge, Stephanie Young, Robert Walters, or I have no interest adverse to the Trustee or the bankruptcy estate in the matters upon which we are to be engaged by the Trustee, and have no connection with the Debtor, its creditors, other parties in interest, their respective attorneys or accountants, purchasers or potential purchasers of the subject real estate, the United States Trustee, or anyone employed by the United States Trustee, except that:
  - (i) Stephen Karbelk, with the support of Stephanie Young and/or Robert
    Walters, has been employed and approved by the Court to assist the
    Trustee with the sale of assets in other bankruptcy cases pending
    before this Court;
  - (ii) We have privately assisted the Trustee in his individual capacity in connection with the sale of real estate. Any services rendered to the

Trustee in his individual capacity were provided approximately seven years ago and no such services have been provided to the Trustee since that time;

- (iii) We are currently representing Fulton Bank as auctioneer in a commercial foreclosure auction in Virginia in an unrelated case, and we have represented Fulton Bank, NA on previous foreclosure auctions and REO sales in unrelated cases;
- (iv) I have worked with David Musgrave, Esq., counsel for Fulton Bank, for over twenty years. In an unrelated case, I am currently employed as Receiver for the Circuit Court for Stafford County for a commercial property in which Fulton Bank is the secured creditor and they are represented by David Musgrave, Esq.;
- (v) In an unrelated case, I have a receivership appointment order pending with the Circuit Court for Montgomery County for a commercial property. David Musgrave, Esq. is counsel for the lender.
- (vi) Mary Lynn Stone, one of the owners of CENTURY 21 New Millennium, is married to Joseph V. Stone, Jr. Mr. Stone is on the Board of Directors of Shore United Bank, a secured creditor in this case.
- (vii) Bala Jain LLC, a secured creditor, is represented by Robert Marino,Esq. I work with Mr. Marino on a regular basis in other Chapter 7bankruptcy cases.

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- (viii) In an unrelated case, I was recently employed by MainStreet Bank to conduct a foreclosure auction. The engagement has concluded and all fees have been paid.
- (ix) In an unrelated case, I worked for Bradley Swallow, Esq., to market a foreclosure auction last year. The engagement has concluded and all fees have been paid.

I declare under penalty of perjury that the foregoing is true and correct.

Stephen Karbelk
Stephen Karbelk
Licensed Real Estate Agent

Date: \_\_\_\_<sup>04/02/2024</sup>